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October 2, 2024

Via CM/ECF and E-Mail

Hon. Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *PDB Ltd. v. Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A.*, Civil Case No. 23-cv-10843-AT: PDVSA Petróleo, S.A.'s Request for Extension of Time

Dear Judge Torres,

We represent Defendant PDVSA Petróleo, S.A. (“Petróleo”). We write pursuant to Rule I.C of your Honor’s Individual Practices to respectfully request a four-week extension of time to respond to Plaintiff’s Amended Complaint. *See* Dkt. No. 35. The current deadline for Petróleo to respond to Plaintiff’s Amended Complaint is October 4, 2024; accordingly, Petróleo requests an extension through November 1, 2024. Plaintiff consents to this request on the condition that Petróleo does not contest service of process, and Petróleo has confirmed that it does not plan to contest service of process.

This is Petróleo’s first request for an extension of time. Petróleo makes this request because it recently retained Vinson & Elkins LLP as counsel, and counsel requires additional time to evaluate the Amended Complaint and prepare Petróleo’s response.

Respectfully submitted,

/s/ Dora Georgescu

Cc: All Counsel